

EXHIBIT 13

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 IN RE: NATIONAL) MDL No. 2804
5 PRESCRIPTION OPIATE)
6 LITIGATION) Case No.
7) 1:17-MD-2804
8)
9)
10 THIS DOCUMENT RELATES TO) Hon. Dan A.
11 ALL CASES) Polster
12)
13)

14 Monday, — — —
15 May 13, 2019
16 — — —
17 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
18 CONFIDENTIALITY REVIEW
19 — — —
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Videotaped Deposition of JAMES E.
RAFALSKI, held at Weitz & Luxenburg PC, 3011
West Grand Avenue, Suite 2150, Detroit,
Michigan, commencing at 9:20 a.m., on the
above date, before Michael E. Miller, Fellow
of the Academy of Professional Reporters,
Registered Diplomate Reporter, Certified
Realtime Reporter and Notary Public.

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1 So you -- you came up with
2 these five methodologies?

3 A. Yes, sir.

4 Q. Okay. And tell me -- tell me
5 why you chose these five methodologies. I
6 think you started to do it, but just go ahead
7 and explain it to me.

8 A. Well, because these are
9 methodologies that were used by one or more
10 companies in my report, during the time frame
11 of my report. Each one of these were not
12 invented by me, but they were actually used.

13 Q. Okay. Can you -- let's start
14 with the first one. Methodology A is maximum
15 monthly trailing six-month threshold.

16 Can you explain to me what you
17 were trying to express here?

18 A. Well, this is the Masters case
19 methodology.

20 Q. Okay.

21 A. Or I shouldn't say methodology.
22 This is their suspicious order system. So
23 it's a rolling six-month, and it looks for a
24 current month that exceeds the highest
25 previous amount in the six months.